

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAULA BURKE-GREEN-WARREN,

Plaintiff,

Civil Action No.: 23-2082
(PGS)

v.

WORLDWIDE FLIGHT SERVICES, INC., INDIGO
PARTNERS & FRONTIER AIRLINES HOLDINGS,
INC. d/b/a FRONTIER AIRLINES,

Defendants.

**JOINT MOTION FOR ENTRY OF CONFIDENTIALITY AGREEMENT AND
STIPULATED PROTECTIVE ORDER**

COME NOW the parties, by and through counsel, pursuant to Fed. R. Civ. P. 26(c), and move this Court for entry of an Agreed Confidentiality Agreement and Stipulated Protective Order, and in support of the Motion, state to the Court as follows:

The parties anticipate discovery in this matter will involve disclosure of confidential and proprietary information, including, but not limited to, policies, procedures, personnel records, contractual agreements, and/or other documents containing confidential or proprietary information of Defendants (“Document Production”). The parties agree that a protective order is necessary to protect the parties’ interests and that good cause exists for entry of a protective order on the

grounds that the Document Production contains confidential, proprietary, and other commercial information, the unconditional disclosure of which would result in competitive disadvantage to Defendants. As a result, the parties request that the Court grant this Motion and enter the Agreed Confidentiality Agreement and Stipulated Protective Order attached hereto as **Exhibit A**.

WHEREFORE, PREMISES CONSIDERED, the parties request that the Court grant their Motion and enter the Agreed Confidentiality Agreement and Stipulated Protective Order attached hereto as **Exhibit A**.

This the 12th day of August, 2023

Respectfully submitted,

BOND, SCHOENECK & KING PLLC

By: /s/ Samuel G. Dobre (with expressed permission by Megan R. Calme)
Samuel G. Dobre, Esq.
Attorneys for Defendant
Worldwide Flight Services
600 Third Avenue, 22nd Floor
New York, New York 10016
(646) 253-2320
sdobre@bsk.com

WILSON ELSEY MOSKOWITZ EDELMAN & DICKER LLP

By: /s/ Megan Calme-Cappellini
Megan Calme-Cappellini, Esq.
Attorneys for Defendant
Indigo Partners & Frontier Airlines Holdings, Inc. d/b/a Frontier Airlines
3102 West End Avenue Suite 400
Nashville, TN 37203
(973)735-5987
megan.calme@wilsonelser.com

LAW OFFICES OF WILLIAM J. FOX, P.C

By: W J Fox

William J. Fox, Esq.
Attorneys for Plaintiff
1626 Pine Street
Philadelphia, PA 19103
(215) 546-2477
wjf@billfoxlaw.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of this pleading has been served via notification by the Court's e-filing system and via electronic mail, this the ____ day of August 2023, upon the following:

Samuel G. Dobre, Esq.
Attorneys for Defendant
Worldwide Flight Services
600 Third Avenue, 22nd Floor
New York, New York 10016
(646) 253-2320
sdobre@bsk.com

William J. Fox, Esq.
Attorneys for Plaintiff
1626 Pine Street
Philadelphia, PA 19103
(215) 546-2477
wjf@billfoxlaw.com

LAW OFFICES OF WILLIAM J. FOX, P.C.

By: _____

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of this pleading has been served via notification by the Court's e-filing system and via electronic mail, this the 12th day of August 2023, upon the following:

Samuel G. Dobre, Esq.
Attorneys for Defendant
Worldwide Flight Services
600 Third Avenue, 22nd Floor
New York, New York 10016
(646) 253-2320
sdobre@bsk.com

William J. Fox, Esq.
Attorneys for Plaintiff
1626 Pine Street
Philadelphia, PA 19103
(215) 546-2477
wjf@billfoxlaw.com

/s/ Megan Calme-Cappellini
Megan R. Calme-Cappellini